



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 2, 2020

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Eugene Castelle*, S7 18 Cr. 15 (AKH)

Dear Judge Hellerstein:

The Government respectfully submits this letter with regard to the conditions of defendant Eugene Castelle's release on bail pending appeal. On March 31, 2020, this Court granted the defendant's motion for release "pursuant to the same conditions that governed his pre-trial release." (Dkt. 673). Those conditions included, among others, "home detention" enforced by electronic monitoring. (*See* Dkt. 173). As the court is aware, "home detention" permits the defendant to leave the home for a variety of different reasons, including employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the supervising Pretrial Services Officer.

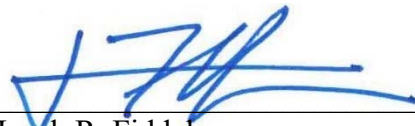
To appropriately protect the public, pursuant to the policy of the Pretrial Services Office in employing a uniform approach to all prisoners temporarily released in light of the COVID-19 pandemic, and in consideration of the substantial limitations on the Pretrial Services Office's ability to effectively conduct supervision and monitoring of releasees in the current environment, the Government and the Pretrial Services Office jointly respectfully request that the Court modify the conditions of the defendant's release from "home detention" to "home incarceration," to be enforced by electronic monitoring, which requires the defendant to remain in his residence 24/7 except for medical emergencies.

The undersigned has consulted with defense counsel, and the defendant consents to this request without prejudice to seeking future modifications.

Respectfully submitted,

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by:



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cc: Richard Levitt, Esq. (by ECF)